

Exhibit 3

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3 UNITED STATES DISTRICT COURT
4 SOUTHERN DISTRICT OF NEW YORK

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6 FRANCESCO GALLO,
7 Plaintiff,

8 -against-

Case No.

9 07CV06418 (CM) (HP)

10 ALITALIA-LINEE AEREE ITALIANE-
11 SOCIETA PER AZIONI, PIERANDREA GALLI,
12 and GIULIO LIBUTTI,

13 Defendants.

)

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15 DEPOSITION OF ANDREA PORRU
16 New York, New York
17 Wednesday, March 12, 2008

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22 Reported by: CAPRICE LATHE
23 Job No.: 10350

24

25

1 A. PORRU

2 people there is a severance.

3 Q Was this something that was offered to
4 everyone in Germany?

5 A No. It depends on the role of the -- in
6 the company. So the basis of the plan was
7 reorganization. Changing some business.

8 Also, organization change and some
9 positions were eliminated due to a big outsourcing
10 in the market of certain function and activities.

11 Q Are you aware of any early retirement plan
12 in Alitalia North America?

13 A Yes. I am aware they put into place in
14 2004 and 2005.

15 Q And who put that into place?

16 A I think Mr. Gallo.

17 Q And why?

18 MR. KORAL: Objection.

19 A I was not here, so I think it was the same
20 reason, because the company was close to bankruptcy,
21 and then it was a rescue plan in place worldwide.

22 Q And was that a plan to eliminate some
23 older workers?

24 A No.

25 MR. KORAL: Objection.